

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

ePLUS INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:09CV620 (REP)
	)	
LAWSON SOFTWARE, INC.,	)	
	)	
	)	
Defendant.	)	

**PROPOSED VOIR DIRE QUESTIONS SUBMITTED ON BEHALF OF  
DEFENDANT LAWSON SOFTWARE, INC.**

**I. QUESTIONS TO BE ASKED OF EACH INDIVIDUAL JUROR**

1. Please state your name.
2. Please give us your home address.
  - a. How long have you lived at that address?
  - b. Is that a house or an apartment?
3. Do you work outside the home? If so, please give us the name and address of the business where you work.
  - a. What does the company do?
  - b. What job do you have at that company?
  - c. What are your daily duties?
  - d. How long have you worked for the company?
4. If you have worked previously, what type of work did you do? Please describe.
  - a. What company?

- b. What does the company do?
  - c. What did you do at that company?
- 5. What is the highest grade you completed in school, including any trade school?
- 6. For any education you had after high school, please describe the type of school and your major courses of study.
- 7. Are you married?
  - a. Do you have any children?
  - b. Are any of your children employed?
  - c. If so, what type of work do they do?
- 8. If you are married, is your spouse employed?
  - a. What is your spouse's occupation and education?
  - b. What is the type of business at which your spouse works?
- 9. Have you been sued before?
  - a. What was involved?
- 10. Have you sued anyone before?
  - a. What was involved?
- 11. Have you been involved in a court proceeding before?
  - a. Were you involved as a juror, witness, party, or otherwise? Please describe your experience.
  - b. What kind of case was it?
  - c. What is your feeling about that experience?
- 12. What volunteer organizations do you belong to?
  - a. What functions or meetings do you attend with those organizations?

13. What can you tell us about your hobbies?
  - a. Do you have any bumper stickers?
  - b. What do they say?

## **II. GROUP QUESTIONS – RELEVANT EXPERIENCES**

1. Have any of you served on a jury before?
  - a. How long ago?
  - b. Civil or criminal?
  - c. Involved in a decision?
  - d. Were you the foreperson?
  - e. Did you feel that your experience as a juror was a positive or a negative experience?
2. Do any of you have negative feelings, negative opinions or have a negative experience with our civil justice system?
3. Have any of you owned, entirely or partially, any kind of a business?
  - a. What was your business?
  - b. How many employees did you have?
  - c. How long did you own the business?
4. Have any of you been a current or former officer, director, shareholder, employee of any of the following organizations?
  - a. ePlus, Inc.
  - b. Lawson Software, Inc.
  - c. Fisher Scientific Procurement

5. Is any member of the jury panel related to or had contact with officers, directors, shareholders or employees of any of the corporations I have just named? If so, please explain.

6. Patents and business experience.

a. Has anyone had any training and/or experience reading and interpreting patents? Tell us about your experience.

b. Has anyone had any training and/or experience marketing products? Tell us about your experience.

c. Have any of you ever been employed where your duties included computers or computerized purchasing or product sourcing systems? Please describe that experience.

d. Is there anyone here that has had any training and/or experience starting or owning a business (other than buying stock)?

i) If so, how many employees did/does it have?

ii) What was/is your role?

iii) How long were/have you been involved with the company?

e. Have any of you ever been involved, in any way, in the process of applying for a patent, a copyright, or a trademark? Tell us about your experience.

f. Have any of you ever invented or designed anything? Please describe your experience.

g. Have any of you been either awarded or denied a patent, a copyright or a trademark? Tell us about your experience.

7. Knowledge of the Case and Participants. This is a patent infringement lawsuit between ePlus, Inc. and Lawson Software, Inc..

a. Is there anyone here that knows anything about this case?

b. Have any of you, or your close friends or relatives, ever been employed by ePlus, Inc. or Lawson Software, Inc.?

c. In addition to the parties, the following witnesses may be involved in this trial: Henrik Billgren, Dale Christopherson, Lynn Cimino, Todd Dooner, Pamela Eng, Kenneth Farber, Laurene Fielder-McEneny, Jeff Frank, Charles Gounaris, Philip Green, Dean Hager, Brooks Hilliard, Jeff Hvass, Robert Irwin, Albert Jacobs, James Johnson, Robert Kinross, Keith Knuth, Richard Lawson, Keith Lohkamp, Russell Mangum, Elaine Marion, Manuel Matias, Steven Mencarini, Douglas Momyer, Patrick Niemeyer, Phillip Norton, Jerry O'Connell, Johanna O'Loughlin, Kristy Oliver, Kleyton Parkhurst, Richard Patton, Hannah Raleigh, Jesus Ramos, Robert Schriesheim, Michael Shamos, Preston Staats, Gene Tabachnick, Guenther Tolkmith, Alfred Weaver, Kenneth White, Vicky Williams, Gerard Wissing, and William Yohasz.

d. Do you know any of these potential witnesses?

8. Does any member of the jury panel know, or have any contact with any of the lawyers in this case? They are:

a. Daniel W. McDonald

b. Kirstin Stoll-DeBell

c. William D. Schultz

d. Rachel C. Hughey

e. Andrew J. Lagatta

f. Joshua P. Graham, or any member of the Twin Cities law firm of Merchant & Gould PC. The Merchant & Gould firm represents the Defendants.

g. Dabney Carr

h. Robert Angle

i. Megan Rahman, or and member of the Richmond VA law firm of

Troutman Sanders LLP, the firm representing the Defendants.

j. Scott L. Robertson

k. Jennifer A. Albert

l. David M. Young, or any member of the Washington DC firm of Goodwin

Proctor LLP. The Goodwin Proctor firm represents the Plaintiffs.

m. Michael G. Strapp

n. James D. Clements, or any member of the Boston MA law firm of

Goodwin Proctor LLP, the firm representing the Plaintiff.

o. Craig T. Merritt

p. Henry I Willett, III, or any member of the Richmond VA law firm of

Christian & Barton, LLP, the firm representing the Plaintiff

q. To the best of your knowledge, have you or anyone in your family, or any close friends ever been represented by any of these lawyers or any of their law firms? If so, what were the circumstances of this representation?

9. New Products.

a. Have any of you ever been involved in any way with marketing, manufacturing, or selling of any kind of new product(s)?

i) What was your position and were your duties with respect to new products?

10. Physical or Scheduling Problems.

- a. Do any of you have a physical problem that would prevent you from serving as a juror in this case? Tell us about your situation.
- b. If this case were to last for two weeks, would it be an extreme hardship for you to serve on this jury? Tell us about your situation.
- c. Does anyone feel that, for any reason, you could not be a fair and impartial juror in this case? Tell us about your situation.

**Lawson Software, Inc.**

By its Attorneys,

Dated:

/s/ Robert A. Angle

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**CERTIFICATE OF SERVICE**

I certify that on this 3rd day of September 3, 2010, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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